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November 13, 2001

By E-Mail

Gloria Blue, Executive Secretary
Trade Policy Staff Committee
Office of the U.S. Trade Representative
600 17th Street, N.W.
Washington, D.C. 20508

PUBLIC DOCUMENT

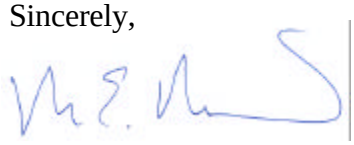
Re: Steel, Investigation No. TA-201-73; Exclusion Request

Dear Ms. Blue:

Pursuant to the notice of request for comments published at 66 Fed. Reg. 54321 (Oct. 26, 2001), we hereby submit the enclosed exclusion request for Thermomechanically Rolled Structural Plate on behalf of AG der Dillinger Hüttenwerke.

If you have any questions, please do not hesitate to contact us by telephone or by e-mail at montalbine@dhlaw.de.

Sincerely,



J. Kevin Horgan
Donald E. deKieffer
Marc E. Montalbine

Attachment

Request To Exclude Products From Import Relief Under Section 203

Steel, Inv. No. TA-201-73

Thermomechanically Rolled Structural Plate

This exclusion request is being submitted on behalf of AG der Dillinger Hüttenwerke.

(a) The designation of the product under a recognized standard or certification (e.g., ASTM, DIN), or the commercial name for the product and the HTS number under which the product enters the United States;

Thermomechanically rolled structural plate. This product is normally imported under HTS No. 7225.40.3050.

(b) A description of the product based on physical characteristics (e.g., chemical composition, metallurgical properties, dimensions, surface quality) so as to distinguish the product from products for which exclusion is not sought;

Structural plates of other alloy steel produced by thermomechanical rolling, that (1) are prequalified for improved weldability under an internationally recognized standard such as API RP2Z, (2) have a minimum yield strength of 60 ksi and meet increased requirements for fracture toughness and ductility, or (3) have a minimum yield strength of 70 ksi.

(c) The basis for requesting an exclusion;

The thermomechanical rolling process is used to produce structural steel plates having a high yield strength level without excessive addition of alloys that would increase the cost of production and impair weldability. Thermomechanically rolled structural plate is not produced in significant quantities in the United States. Therefore, the imposition of safeguard measures limiting the availability of these products would cause great harm to the U.S. purchasers who rely upon these products.

(d) The names and locations of any producers, in the United States and foreign countries, of the product;

See attached **Appendix 1**.

(e) Total U.S. consumption of the product, if any, by quantity and value for each year from 1996 to 2000, and projected annual consumption for each year from 2001 to 2005, with an explanation of the basis for the projection;

See attached **Appendix 2**.

(f) Total U.S. production of the product for each year from 1996 to 2000, if any; and

See attached **Appendix 2**.

(g) The identity of any U.S.-produced substitute for the product, total U.S. production of the substitute for each year from 1996 to 2000, and the names of any U.S. producers of the substitute.

There are no adequate substitutes for thermomechanically rolled structural plate. Plates having comparable yield strengths that have not been produced by thermomechanical rolling have significantly impaired weldability.

For any questions regarding this request, please contact:

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U.S. & Foreign Producers

U.S. Producers:

None

Foreign Producers:

AG der Dillinger Hüttenwerke
Werkstraße 6
D-66748 Dillingen
Germany

voestalpine Grobblech GmbH
Voest-Alpine-Str. 3
A-4031 Linz
Austria

Thyssen Krupp Stahl AG
Kaiser Wilhelm-Str. 100
D-47166 Duisburg
Germany

U.S. Consumption & Production
Thermomechanically Rolled Structural Plate

Item	Quantity (in short tons)									
	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005
U.S. Consumption	10,000	12,000	15,000	17,000	20,000	22,000	23,000	24,000	25,000	26,000
U.S. Production	0	0	0	0	0					

Item	Value (U.S. dollars)									
	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005
U.S. Consumption	7,000,000	8,400,000	10,500,000	11,900,000	14,000,000	15,400,000	16,100,000	16,800,000	17,500,000	18,200,000

U.S. consumption and production quantities are based upon market estimates. U.S. consumption values are based upon a price of $700/short ton.